



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Office of
Chemical Safety
& Pollution Prevention

April 14, 2011

Luanne Jeram
Lanxess Corporation
111 Park West Drive
Pittsburgh, PA 15275

Subject: Response to Imidacloprid Registration Review Data Call-in
RR-129099-30160

Registration: EPA Reg. Nos. 39967-17 & 39967-58

Dear Ms. Jeram,

The Agency has received your 90-day response to the Data Call-In (RR-129099-30160), in which you claimed formulators' exemption to all the data requirements except for the indoor residue dissipation study (GLN 875.2300). After reviewing the current registration files, the Agency will grant a formulator's exemption for EPA Reg. Nos. 39967-17 & 39967-58 for all of the data required by the data call-in. For GLN 875.2300, Lanxess Corporation has committed to generate and submit these data.

In your response, you indicate that Lanxess plans to generate the data needed on post-application exposure to imidacloprid treated [outdoor] materials through a modified version of the indoor surface residue dissipation study (GLN 875.2300), i.e., a non-guideline study that has been, or is being developed for Office of Pesticide Programs, Antimicrobial Division. To ensure that this non-guideline study will address the data need, EPA suggests that a protocol for this study be submitted for review prior to study initiation. Aside from satisfying the post-application exposure study to imidacloprid treated [outdoor] material, no further submissions are necessary to satisfy the remaining requirements of the registration review data call-in (RR-129099-30160).

If you have any questions, please contact Rusty Wasem of my staff at wasem.russell@epa.gov or (703) 305-6979.

Sincerely,



Neil Anderson, Chief
Risk Management & Implementation Branch I
Pesticide Re-evaluation Division

cc: T.Leighton